



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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Writer's Direct Dial: (212)

March 15, 2024

BY ECF

Hon. Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Wiggins v. Griffin, et al. (18 Civ. 7559) (PMH)

Dear Judge Halpern:

This Office represents New York State Department of Corrections and Community Supervision ("DOCCS") Defendants Kopp, Howard, and Jebamani in the above-referenced action.

We write with the consent of counsel for Plaintiff Robert Wiggins, to respectfully request a brief extension of time – one week, until March 25, 2024 – to submit the parties' proposed Joint Pre-Trial Order, jury charges, verdict sheet, and voir dire, as well as any motions *in limine*.

The pre-trial materials are currently due to be submitted to the Court on March 18, 2024, and we apologize for submitting this request outside of the Court's requirement that such a request be submitted two business days ahead of the deadline. However, as the parties conferred this week, and continue to work diligently to exchange materials, certain issues arose that require additional time to resolve. This is the first request for additional time, and it will not affect any other scheduled dates, as no trial date has been ordered. Accordingly, the parties respectfully request until March 25, 2024, to submit the pre-trial materials in this action.

Thank you for your attention to this matter.

Respectfully submitted,

s/

Michael J. Keane
Assistant Attorney General
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Application granted.

The Clerk of the Court is respectfully directed to terminate the motion sequence pending at Doc. 94.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 18, 2024

